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June 10, 2019

Via ECF and Hand Delivery

Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1610
New York, New York 10007

Re: *SEC v. Alpine Securities Corp.*, Civil No. 1:17-cv-04179-DLC-RLE
Request to File Certain Declarations and Exhibits Under Seal

Dear Judge Cote:

Pursuant to the Court's Individual Practices 4.A and 3.D and pursuant to the Court's standing Order dated July 12, 2018 [Dkt. 145], Defendant Alpine Securities Corporation's ("Alpine") requests to file the Declaration of David Brant, including exhibits, the Declaration of Christopher Doubek, exhibits 1-6 to the Declaration of Maranda Fritz and portions of Alpine's Memorandum in Opposition of the SEC's Motion for Remedies under seal. In the Court's July 12, 2018 Order, the Court stated that "the parties may file redacted and placeholder materials in connection with the summary judgment briefing on ECF without first obtaining the approval of the Court to the extent that the materials are similar to those for which such approval has already been given in connection with the motions for partial summary judgment." Both parties have continued to file documents under seal in this matter.

Alpine is filing 9 exhibits to the Declaration of Maranda Fritz in support of its Memorandum in Opposition to the SEC's Motion for Remedies. Exhibits 1 through 6 are deposition transcripts that were each filed under seal with Alpine's summary judgment briefing because such depositions were marked as confidential and Bank Secrecy Act material under the Court's protective order. *See* Dkt. 153-1, Ex. 2-4, 10, 15-16. Exhibits 7 through 9 are declarations and a chart from the SEC's expert's report that have been publicly filed and Alpine will again publicly file these exhibits.

The Declarations of David Brant (including exhibits) and Christopher Doubek discuss Alpine's confidential financial information, including attachments of financial records that are filed with the SEC and are designated as confidential under SEC Rule 17.

In addition, Alpine requests to file a copy of its Memorandum in Opposition to the SEC's Motion for Remedies, redacted to protect Alpine's confidential financial information.

Alpine will submit digital copies of the Memorandum in Opposition and exhibits filed under seal *via* email and deliver hard copies of the same directly to the Court's chambers.

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Based on the foregoing, Alpine requests that the Court allow Alpine to submit the sealed exhibits and declarations described above to the Court's chambers and file a redacted Memorandum in Opposition as described above.

Respectfully submitted,

/s/Maranda Fritz

Maranda Fritz

cc: Counsel of Record (via CM/ECF and email)